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February 24, 2020

VIA ECF

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *Rich v. Fox News Network LLC et al.*, Civ. No. 18-cv-02223

Dear Judge Netburn:

I write on behalf of Plaintiffs Joel and Mary Rich and Defendants Fox News Network LLC and Malia Zimmerman (the “Parties”) pursuant to the Court’s Order that the parties jointly file, by February 24, 2020, a letter updating the Court as to the status of an ESI protocol. Dkt. 110. The parties have been negotiating search terms and custodians, and we believe we will reach agreement on most issues relating to ESI protocol. However, the parties need a few more days to complete negotiations over search terms. Therefore, the Parties jointly request an extension until February 27, 2020, to file the letter(s) that the Court ordered in Dkt. 110.

Sincerely,



Elisha Barron